

Date: May 19, 1998

Subject: Minutes from the May 18, 1998 Teleconference Between the Environmental Protection Agency (EPA) and Representatives from Engine Test Facilities.

From: Brian Strong  
Michael Wiggins

To: George Smith  
Combustion Group/ESD/OAQPS (MD-13)  
U. S. Environmental Protection Agency  
Research Triangle Park, NC 27711

I. Purpose

The U. S. Environmental Protection Agency (EPA) recently began development of National Emission Standards for Hazardous Air Pollutants (NESHAP) for the engine test facilities source category. A teleconference was held on May 18, 1998 between the EPA and representatives from engine test facilities. The purpose of the meeting was to introduce the stakeholders and EPA representatives, discuss the NESHAP process, present the schedule for NESHAP development, and address members' comments and concerns.

II. Attendees

U. S. Environmental Protection Agency (EPA)

George Smith

Industry Representatives (via teleconference)

Michael Block, Engine Manufacturers Association  
Walter Brown, Engine Manufacturers Association  
Julie Craig, Consolidated Diesel Company  
Everett Douglas, Aircraft Environmental Support Office  
Stephen Fotis, Van Ness Feldman (on behalf of Toyota)  
Dave Hagen, Automobile Engine Rebuilders Association  
Amy Lilly, Association of International Automobile Manufacturers  
John McKnight, National Marine Manufacturers  
Gene Praschan, American Automobile Manufacturers Association  
Mark Reechia, Fiat  
Glynn Rountree, Aerospace Industries Association  
Cathy Jo Seamon, American Automobile Manufacturers Association  
Terry Ullman, Southwest Research Institute

Midwest Research Institute (MRI)

Doug Lincoln  
Brian Strong  
Michael Wiggins

III. Discussion

Handouts on the information to be discussed were provided to the participants prior to the teleconference (see attachments). This meeting summary does not repeat the material in the handouts but summarizes the discussions of the attendees.

A. Introduction

George Smith began the meeting by requesting that each of the industry, MRI, and EPA representatives identify themselves and their respective affiliations. Mr. Smith discussed the reasons for developing a NESHAP for Engine Test Facilities. He mentioned that Section 112 of the Clean Air Act (CAA) requires EPA to develop NESHAP and that EPA has identified engine test facilities as emitting several of the hazardous air pollutants (HAP's) listed in Section 112(b) of the CAA.

Walter Brown stated that the Engine Test Facilities NESHAP is very similar to the Industrial Combustion Coordinated Rulemaking (ICCR) NESHAP. He stated that the Engine Test Facilities NESHAP is redundant because a lot of the work has been performed for the ICCR NESHAP. Mr. Smith remarked that EPA is trying to determine whether engine testing will be covered by the ICCR NESHAP or the Engine Test Facilities NESHAP. He mentioned that EPA is presently thinking that engine testing will be regulated by the Engine Test Facilities NESHAP. Mark Reechia asked if small locations will be covered by the Engine Test Facilities NESHAP.

Mr. Smith stated that EPA is in the beginning stages of developing a NESHAP for Engine Test Facilities and the scope of the source category is unknown at this point. Mr. Smith stated that area sources will probably not be regulated, however, engine testing operations that are co-located at major sources will be covered by the Engine Test Facilities NESHAP.

Stephen Fotis asked what type of testing the NESHAP will regulate. Brian Strong stated that all types of testing are presently being examined. Mr. Brown asked if the NESHAP will regulate the testing of an engine that is located in a stationary automobile. Mr. Smith remarked that the scope of the source category has not been determined. He stated that all engine testing sources are being examined.

B. Discussion of NESHAP Process

Mr. Strong presented the material located in the handouts. After presenting the material, Mr. Strong asked if there were any questions. Glynn Rountree asked why EPA is interested in the non-HAP emissions from engine test facilities. Mr Strong stated that EPA would weigh the benefits involved in decreasing a HAP emission if the decrease would cause an increase in a non-HAP emission, such as a criteria pollutant.

John McKnight stated that he did not know of any emission factors for marine engines. Everett Douglas stated that EPA needs to perform emission tests in order to make a NESHAP for Engine Test Facilities. Mr. Douglas stated that emission data for engine testing is very limited.

Mr. Strong asked the engine testing representatives if there are any local sites that EPA could visit. Mr. Strong stated that EPA resources are very limited. Julie Craig stated that EPA could visit Consolidated Diesel Company in Whitakers, North Carolina.

Mr. Douglas asked about the applicability in grouping diesel engines, turbine engines, and combustion engines under the same NESHAP. Mr. Strong stated that EPA is presently examining the engine testing category and that the NESHAP could subcategorize different engine types. Mr. Strong stated that EPA is only in the beginning stages of developing a NESHAP for engine testing. Mr. Praschan asked if the engine testing industry will be consulted in the development of the information collection request (ICR). Mr. Smith stated that EPA desires to include the engine testing representatives in the development of the ICR.

Mr. Strong stated that EPA will post information on an engine testing web site. The web site information will include meeting minutes, announcements, and EPA progress on the Engine Test Facilities NESHAP. The web site is “[www.epa.gov/ttn/uatw/engtest/rock\\_eng.html](http://www.epa.gov/ttn/uatw/engtest/rock_eng.html)”.

Mr. Strong requested that Engine Test Facility Representatives send their contact information to him at his e-mail address, which is located in the handout. The contact information is necessary in order to coordinate future meetings.

ATTACHMENT  
MEETING AGENDA

**AGENDA--ENGINE TESTING NESHAP  
MAY 18, 1998 INDUSTRY MEETING  
10:00 a.m. Eastern Time  
Call in Phone Number: (919) 541-4332**

**INTRODUCTIONS**

- George Smith EPA  
EPA Lead Engineer  
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- Introduction of stakeholders on the line

**PURPOSE**

- Clean Air Act Section 112 (Air Toxics) requires National Emissions Standards for Hazardous Air Pollutants (NESHAP)
- EPA has determined that engine test facilities may emit several of the hazardous air pollutants listed in section 112(b)
- EPA is required to promulgate NESHAP for engine test facilities by November 15, 2000

## PROCESS

### PHASE I--Data Collection

- Determine scope of the source category
- Industry profile including:
  - Facilities and facility location
  - Identifying types of facilities (ie. IC engines, turbines, etc.)
  - Economic data
- Process description
  - Testing schedules
  - HAP and non-HAP emission points
  - Pollutants emitted
- Applicable control technologies and pollution prevention
  - Description of control technologies
  - Safety considerations w/installing control technologies
  - Pollution prevention measures
  - Control efficiencies/emission reductions
  - Control costs
- Current industry practices relative to air pollution control

### PHASE II--Regulatory development

- Proposed standards including:
  - Emission limits based on maximum achievable control technology (MACT) standards
    - Differing standards for new and existing sources:
      - New sources “..not be less stringent than the emission control that is achieved in practice by the best controlled similar source, as determined by the Administrator”
      - Existing sources “the average emission limitation achieved by the best performing 12 percent of the existing sources (for which the Administrator has emission information)...”
    - Compliance dates
    - Test methods and compliance procedures
    - Monitoring and/or inspection requirements
    - Recordkeeping requirements
    - Reporting requirements
- Final standards

## **SCHEDULE**

- Background Information  
March through June 1998
- Site Visits  
June through December 1998
- Section 114 Information Collection Request  
July 1998 through January 1999
- Testing  
August 1998 through March 1999
- Proposed Standards  
November 1999
- Final Standards  
November 2000

## **TENTATIVE MEETING TOPICS/TIMES**

- EPA plans the following tentative conference calls/meetings to give stakeholders the opportunity to comment on the regulatory process
- Need to determine the mode of contact for meetings (is e-mail possible, etc.)
- Meeting dates to be determined